

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Boston Gas Company, Colonial Gas)
Company, Essex Gas Company each d/b/a)
KeySpan Energy Delivery New England)

D.T.E. 06-54

**INSTRUCTIONS FOR ALL ATTORNEY GENERAL'S DISCOVERY
ISSUED TO THE COMPANY IN THIS PROCEEDING**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Gas Company, Colonial Gas Company, and Essex Gas Company d/b/a KeySpan Energy Delivery New England (KeySpan) or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate **DATED** page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of

the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.

15. Provide four (4) copies of each response and two (2) copies of all bulks.
16. The term "Company" refers to KeySpan. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

**ATTORNEY GENERAL'S THIRD SET OF
INFORMATION AND DOCUMENT REQUESTS**

- AG-3 -1 Refer to Exhibit ("Exh.") TEP-1, pages 13-14 and Exh. TEP-4. Please explain, in detail, how the Company would have provided safe, reliable service to its Cape Cod customers had the Company experienced Design Day conditions on Cape Cod during 2004/05 and 2005/06.
- AG-3 -2 Refer to Exh. TEP-4. Please explain why in 2004/05 the Chatham/Eastham resource increases to 295 MMBtu/hr from 60 MMBtu/hr in the prior year and then decreases to 90 MMBtu/hr for the remaining years (2005/06 through 2014/15).
- AG-3 -3 Refer to Exh. TEP-1, pages 13-14. Please explain how system pressure requirements are translated into peak-hour requirements. Provide all supporting documentation and calculations, including all Company policy, procedure and planning manuals, guidelines or reports related to maintaining pressure and the derivation and use of 5% peak hour requirement.
- AG-3 -4 Please provide copies of any and all orders and directives issued by the Department of Telecommunications and Energy, and communications (including written, oral, and electronic) with the Department that acknowledge the use of a peak-hour planning or resource acquisition standard. If the Company cannot provide copies, explain why not and identify those orders, directives, and communications that the Company cannot produce.